

EXHIBIT N

R. Higgins e-mail correspondence dated June 28, 2021 (without attachment)

Roger Higgins

From: Roger Higgins
Sent: Monday, June 28, 2021 8:33 AM
To: rk@kraft.legal
Cc: ryan.roman@akerman.com
Subject: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation")
Attachments: Grace Confirmation Order.pdf; RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Kraft,

I am writing in response to your second e-mail correspondence of June 25, 2021. Please find attached a copy of the confirmation order, as you requested. This is a publicly available document that may be obtained from the Grace chapter 11 docket maintained by the Delaware Bankruptcy Court.

To answer your question regarding notice to you, the confirmation order contains explicit actual and publication notice provisions. According to Grace's books and records, there is no record of you having filed a claim or otherwise participated in the chapter 11 case. The same is true for the entities you assert assigned the claims to you. Therefore, you and those entities are bound by the publication notice provisions of the confirmation order. The Grace chapter 11 docket maintained by the Delaware Bankruptcy Court contains the relevant certificates verifying requisite publication notice.

As to the scope of the provisions discharging Administrative Expense Claims and precluding all creditors, whether previously known or unknown, from asserting such claims after the May 5, 2014 Administrative Claims Bar Date, there is no exception for RICO claims.

Therefore, you are bound by the confirmation order and the chapter 11 plan.

You must file a "Dismissal Pleading" no later than July 7, 2021. You must inform me in writing no later than July 2, 2021, of your intent to do so.

If you do not, Grace reserves the right to file a motion in the Delaware bankruptcy court seeking an order compelling you to do so.

If you take any action in the Arizona Litigation other than to file a Dismissal Pleading, Grace reserves the right, as I have previously explained, to file a motion in the Delaware Bankruptcy Court seeking sanctions.

Please confirm to me in writing (via e-mail correspondence will be acceptable) that you will not take any action in the Arizona Litigation involving Grace other than to file a Dismissal Pleading.

Finally, you mentioned that you are offering to "interact ... about specific facts" in the complaint relevant to Grace.

If you have documents relevant to Grace and the alleged December 2006 transaction, I would appreciate your sending them to me via e-mail correspondence at your earliest opportunity.

In closing, I appreciate your prompt response to both my letter of this Friday morning, and my e-mail correspondence of Friday afternoon. As I mentioned earlier in the e-mail correspondence, I urge you to confirm to me in writing at (via e-mail correspondence will be acceptable) that you will not take any action in the Arizona Litigation involving Grace other than to file a Dismissal Pleading.

Warmest Regards. R

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